EXHIBIT 66

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1
             UNITED STATES DISTRICT COURT
           FOR THE NORTHERN DISTRICT OF OHIO
2
                   EASTERN DIVISION
3
     IN RE: NATIONAL
                             )
4
     PRESCRIPTION
                                MDL No. 2804
     OPIATE LITIGATION
                             )
5
                             ) Case No.
                             )
                                1:17-MD-2804
 6
      THIS DOCUMENT RELATES ) Hon. Dan A.
7
                            ) Polster
     TO ALL CASES
 8
                TUESDAY, JULY 31, 2018
 9
      HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
10
                CONFIDENTIALITY REVIEW
11
12
               Videotaped deposition of Nathan J.
13
    Hartle, held at the offices of Covington &
    Burlington, LLP, One City Center, 850 Tenth
14
    Street Northwest, Washington, DC, commencing
15
    at 9:04 a.m., on the above date, before
16
    Carrie A. Campbell, Registered Diplomate
17
    Reporter, Certified Realtime Reporter,
18
19
    Illinois, California & Texas Certified
20
    Shorthand Reporter, Missouri & Kansas
21
    Certified Court Reporter.
22
              GOLKOW LITIGATION SERVICES
           877.370.3377 ph | 917.591.5672 fax
23
                    deps@golkow.com
24
25
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	ighly Confidential - Subject to	, ,	
	Page 218		Page 220
1	MS. HENN: Objection to form.	1	trying to make a snarky remark.
2	THE WITNESS: All I can tell	2	MS. HENN: Thank you.
3	you is I what I've heard is that	3	OUESTIONS BY MR. FARRELL:
4	it's the term that came from DEA.	4	Q. Not everyone is engaged in the
5	QUESTIONS BY MR. FARRELL:	5	chain of distribution of opium pills, though?
6	Q. On page 2, it identifies	6	MS. HENN: Objection to form.
	several different topics: public health	7	THE WITNESS: Agree.
	issue, DEA focus, McKesson involvement,	В	OUESTIONS BY MR. FARRELL:
9	current status, and Lifestyle Drug Monitoring	9	Q. So I'm asking you, McKesson
!		10	Corporation, whether or not you have any
	Program. So these will be our jeopardy	11	regrets about selling so many opium pills.
12	questions today.	12	0 - 1 -
	Public health issues. Can you	13	MS. HENN: Objection to form.
	read what the very on page 3, can you read	14	Outside the scope.
	what the first item is?		THE WITNESS: Back to your
15	A. "Abuse of prescription drugs	15	question about this, I would sure
	has risen 66 percent since 2000."	16	that gives you pause, I mean, to
17	Q. So this is McKesson telling	17	understand that there's an epidemic
18	McKesson employees that we're in the business	18	out there. And clearly there's many
19	of selling opium pills, and abuse has risen	19	players involved in the flow of
20	66 percent since 2000.	20	distribution.
21	Does that not give you,	21	QUESTIONS BY MR. FARRELL:
22	Mr. McKesson Corporation, pause to think	22	Q. As of 2007, McKesson is
23	about whether or not your role in the chain	23	recognizing that opioid painkillers kill more
24	of distribution is contributing to the abuse?	24	than cocaine and heroin combined, agreed?
25	MS. HENN: Objection to form.	25	MS. HENN: Objection to form.
	Page 219		Page 221
1	Page 219 THE WITNESS: Can you ask that	1	Page 221 THE WITNESS: Agree.
1 2	THE WITNESS: Can you ask that	1 2	THE WITNESS: Agree.
2	THE WITNESS: Can you ask that again, please?	ļ	THE WITNESS: Agree. QUESTIONS BY MR. FARRELL:
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2 3 4	THE WITNESS: Can you ask that again, please? QUESTIONS BY MR. FARRELL: Q. This is McKesson telling	2 3 4	THE WITNESS: Agree. QUESTIONS BY MR. FARRELL: Q. And these are McKesson's words. Where is McKesson getting this
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2 3 4 5	THE WITNESS: Can you ask that again, please? QUESTIONS BY MR. FARRELL: Q. This is McKesson telling McKesson employees that abuse of prescription drugs has risen 66 percent since the year	2 3 4 5 6	THE WITNESS: Agree. QUESTIONS BY MR. FARRELL: Q. And these are McKesson's words. Where is McKesson getting this data from? MS. HENN: Objection to form.
2 3 4 5	THE WITNESS: Can you ask that again, please? QUESTIONS BY MR. FARRELL: Q. This is McKesson telling McKesson employees that abuse of prescription drugs has risen 66 percent since the year 2000.	2 3 4 5	THE WITNESS: Agree. QUESTIONS BY MR. FARRELL: Q. And these are McKesson's words. Where is McKesson getting this data from? MS. HENN: Objection to form. Outside the scope.
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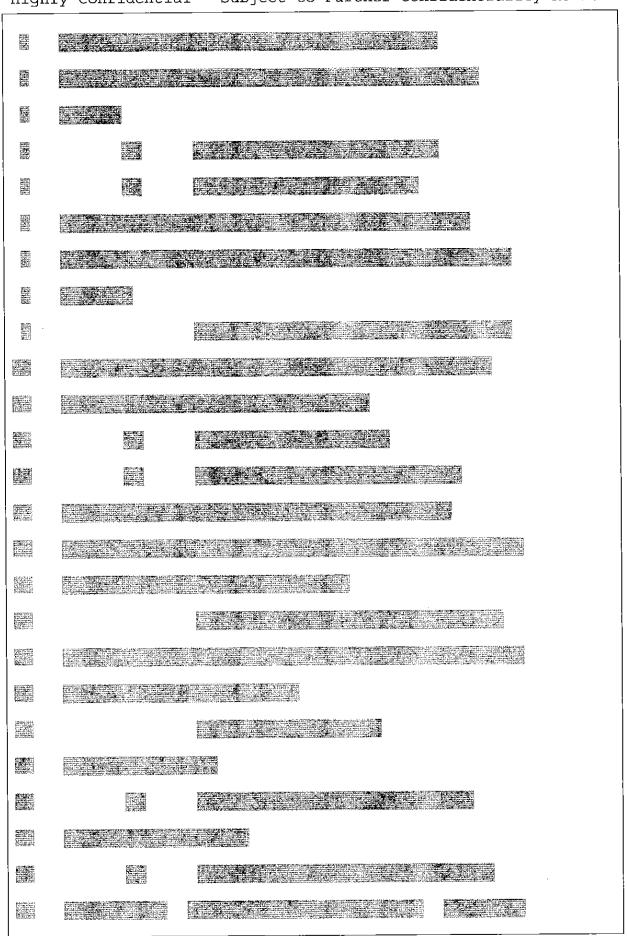
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Page 222
                                                                                              Page 224
                                                     OUESTIONS BY MR. FARRELL:
 <sup>1</sup> Internet pharmacies are selling oxycodone and
                                                                You understand that to be true?
<sup>2</sup> hydrocodone, yet what's missing from this
                                                           Q.
                                                     3
<sup>3</sup> slide is the fact that McKesson was supplying
                                                           Α.
                                                                -- I understand that to be
                                                     4 true.
  the pills to the rogue Internet pharmacies.
           MS. HENN: Objection to form.
                                                           Q.
                                                                So McKesson Corporation admits
                                                     <sup>6</sup> it was selling oxycodone and hydrocodone to
 6
           THE WITNESS: And what's your
       specific question again?
                                                       rogue Internet pharmacies in and around 2007?
                                                               MS. HENN: Objection to form.
   QUESTIONS BY MR. FARRELL:
                                                     9
                                                           Outside the scope.
       Q.
            What gives?
                                                    10
                                                               THE WITNESS: Again, I don't
           MS. HENN: Objection to form.
10
                                                    11
                                                           know the specific examples and --
11
           THE WITNESS: I don't know what
                                                       QUESTIONS BY MR. FARRELL:
12
       type of response a "what gives"
                                                    12
                                                    13
                                                                I'm not asking for specific
13
       question is.
                                                           Q.
                                                    14
                                                       examples.
14
   QUESTIONS BY MR. FARRELL:
                                                    15
15
            Yeah. You're noting that
                                                           Α.
                                                                Right.
16 people are dying, and part of the reason is
                                                    16
                                                           O.
                                                                I'm asking you to confirm that
                                                       in 2007, McKesson Corporation was selling
that rogue Internet pharmacies are out there.
18 Yet McKesson, during this time frame, is
                                                       oxycodone and hydrocodone to rogue Internet
19 selling to some of those very same Internet
                                                       pharmacies.
   pharmacies, and that's what the DEA fined you
                                                    20
                                                                MS. HENN: Objection to form.
                                                    21
                                                               And, Counsel, I'll just ask you
<sup>21</sup> for.
22
                                                    22
           So is this ignorance of who
                                                           to let him finish his answers so that
                                                           he can get his answers out.
                                                    23
23 you're selling to? Is this repackaging,
                                                    24
                                                                MR. FARRELL: Yes, ma'am.
<sup>24</sup> reframing the issue? Or is it just flat out
                                                    25
                                                                THE WITNESS: Again, I don't
<sup>25</sup> a misrepresentation?
                                                                                              Page 225
                                          Page 223
                                                     1
            MS. HENN: Objection to form.
                                                           have the specific examples. I believe
 1
 2
                                                     2
                                                           that to be true, but I don't know the
       Outside the scope.
                                                           specific details.
                                                     3
 3
            THE WITNESS: This is raising
                                                       QUESTIONS BY MR. FARRELL:
 4
       awareness in -- about the issues that
       are the public health issues,
                                                                The next page, page 4,
                                                     <sup>6</sup> "Internet pharmacies." It says,
 6
       communicating with leaders and sharing
                                                     <sup>7</sup> "Investigative work hours have doubled."
 7
       the -- where McKesson is enhancing the
                                                     8
                                                               Do you know what it doubled
       program.
                                                       from or to?
   QUESTIONS BY MR. FARRELL:
                                                    10
             But you understand that the
                                                           A.
                                                                I do not.
                                                    11
                                                           Q.
                                                                 "Cutting supply critical to
11 rogue Internet pharmacies were getting their
                                                    12 success."
12
   pills from, among other people, McKesson,
                                                    13
13
                                                                What does that mean?
   agreed?
                                                    14
                                                               I don't know. I don't know
14
       Α.
            I understand.
15
            MS. HENN: Objection to form.
                                                    15
                                                       what the speaking points or -- it's one
                                                    <sup>16</sup> bullet. I'm not sure how it was represented
   OUESTIONS BY MR. FARRELL:
17
                                                    17
                                                       or communicated.
             Agreed?
       Q.
18
                                                    18
                                                                Do you know what price
             I understand. Agreed.
                                                           Q.
       A.
             I'm asking if you understand.
                                                    19
19
                                                       diversion is?
       Q.
                                                    20
<sup>20</sup> I want you to confirm that the rogue Internet
                                                           Α.
                                                                Not specifically.
                                                    21
                                                                 Was McKesson at this time
   pharmacies were in fact getting some of their
                                                           Q.
                                                    22 considering that some of the Internet
   pills from McKesson.
23
            MS. HENN: Objection to form.
                                                    <sup>23</sup> pharmacies were competing with McKesson for
                                                    <sup>24</sup> business?
24
            THE WITNESS: I don't have
                                                    25
                                                                MS. HENN: Objection to form.
25
       specific details on that, but --
```

```
Page 226
                                                                                           Page 228
1
           THE WITNESS: I do not know.
                                                             Go ahead.
2
      Pricing is not my area.
                                                   2
                                                             THE WITNESS: That's what
                                                   3
  QUESTIONS BY MR. FARRELL:
                                                         the -- that's what the DEA expects, I
            Okay. It says, "Wholesalers.
                                                         guess, yeah.
                                                   <sup>5</sup> QUESTIONS BY MR. FARRELL:
   DEA expects that you know your customers."
           What does that mean? It's in
                                                         Q. Does McKesson acknowledge that
                                                   <sup>7</sup> it is accountable for controlling the
   quotations.
                                                   <sup>8</sup> quantities of opium pills shipped to American
            Right.
      A.
                                                     pharmacies?
           MS. HENN: Objection to form.
10
           MR. FARRELL: Well, it is in
                                                  10
                                                         A.
                                                               We're accountable as a
                                                  11 distributor.
11
       quotations, isn't it?
12
           MS. HENN: I was objecting to
                                                  12
                                                         Q.
                                                              The next thing says, "5,000
                                                  13 dose units is average."
13
      asking what DEA means when they said
14
       "know your customers." That was what
                                                             The average American pharmacy
15
       was my objection.
                                                  in 2007, as reported by the DEA to McKesson,
16 OUESTIONS BY MR. FARRELL:
                                                  was that 5,000 doses of oxycodone or 5,000
17
       Q. So McKesson is writing a slide
                                                     doses of hydrocodone was average.
18
   following a meeting with the DEA, reporting
                                                  18
                                                         A.
                                                              That's what the DEA -- DEA
                                                  19 calculations.
19 to the DEA employees what the DEA's focus
                                                  20
<sup>20</sup> was, and what McKesson is reporting is that
                                                         O.
                                                              And McKesson at least validated
<sup>21</sup> the DEA expects you to know your customers.
                                                  21 that number by repeating it on a slide to the
           Is that fair?
                                                     national operations conference in 2007.
23
                                                  23
                                                             MS. HENN: Objection to form.
       A.
            That's fair.
24
                                                  <sup>24</sup> QUESTIONS BY MR. FARRELL:
       Q.
            And when we do, quote, "know
our customers," end quote, that's a tag line
                                                  25
                                                         O.
                                                              Agreed?
                                         Page 227
                                                                                           Page 229
<sup>1</sup> for distributors with regard to knowing the
                                                         A. I wouldn't say that they
  customers you're selling opium pills to?
                                                     validated. We just repeated what was shared.
3
           MS. HENN: Objection to form.
                                                         Q. Did McKesson undertake any
4
           THE WITNESS: That is a DEA tag
                                                   <sup>4</sup> investigation to determine what the average
                                                     was itself?
      line.
   QUESTIONS BY MR. FARRELL:
                                                               I believe they did. I can't
                                                         A.
       Q. And then the next sentence, can
                                                   <sup>7</sup> speak to the examples, but we've used
                                                   <sup>8</sup> analysts and reviewed data when developing
   you read it out loud, please?
9
            The next bullet?
                                                     thresholds and...
       A.
10
            Yes.
                                                  10
                                                              Does McKesson acknowledge that
       Q.
                                                         O.
                                                     in 2007 5,000 dose units was average in the
11
            "Wholesalers accountable for
       A.
12
   controlling quantities shipped."
                                                  <sup>12</sup> United States of America?
13
                                                  13
           Is that true or not true?
                                                              MS. HENN: Objection to form.
14
           MS. HENN: Objection to form.
                                                  14
                                                         Outside the scope.
15
                                                  15
                                                              THE WITNESS: We acknowledge
           THE WITNESS: Can you add a
16
                                                  16
      little more context to your question?
                                                         that's what the DEA shared. I mean,
17
                                                  17
      I know it's a true/false question,
                                                         there's many ways to get averages.
18
      but --
                                                     QUESTIONS BY MR. FARRELL:
19
                                                  19
   OUESTIONS BY MR. FARRELL:
                                                               Sitting here today, does
                                                  <sup>20</sup> McKesson Corporation have any reason to
20
           Yes.
21
           The DEA expects the wholesalers
                                                     disagree or dispute the DEA's estimation of
                                                  22
  to be accountable for controlling quantities
                                                     what the average dose unit was?
                                                  23
                                                              MS. HENN: Objection to form.
<sup>23</sup> that they ship.
24
           Is that fair or unfair?
                                                  24
                                                         Outside the scope.
25
                                                  25
                                                              THE WITNESS: What I would
           MS. HENN: Objection to form.
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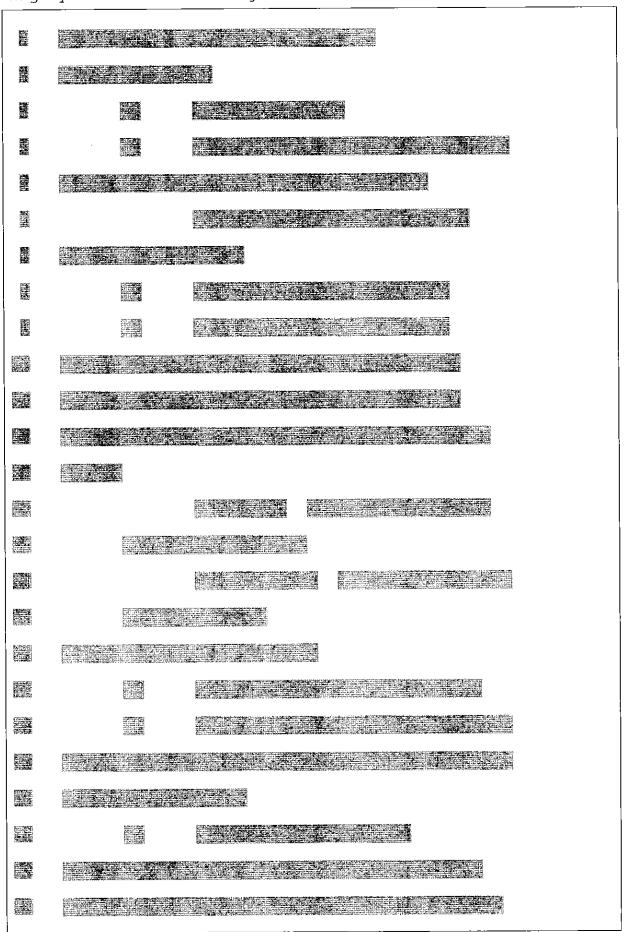
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	3
1	share is I believe that average is a
2	very rudimentary average, all
3	pharmacies divided by pills, and so it
4	doesn't account for different pharmacy
5	size. So it's the number that is the
6	result of that basic calculation.
7	QUESTIONS BY MR. FARRELL:
5 (4) 5 (4)	
Property of the second	
\$15.7 14.33	
Westerness Parties and Services	
72.20	
A STREET	

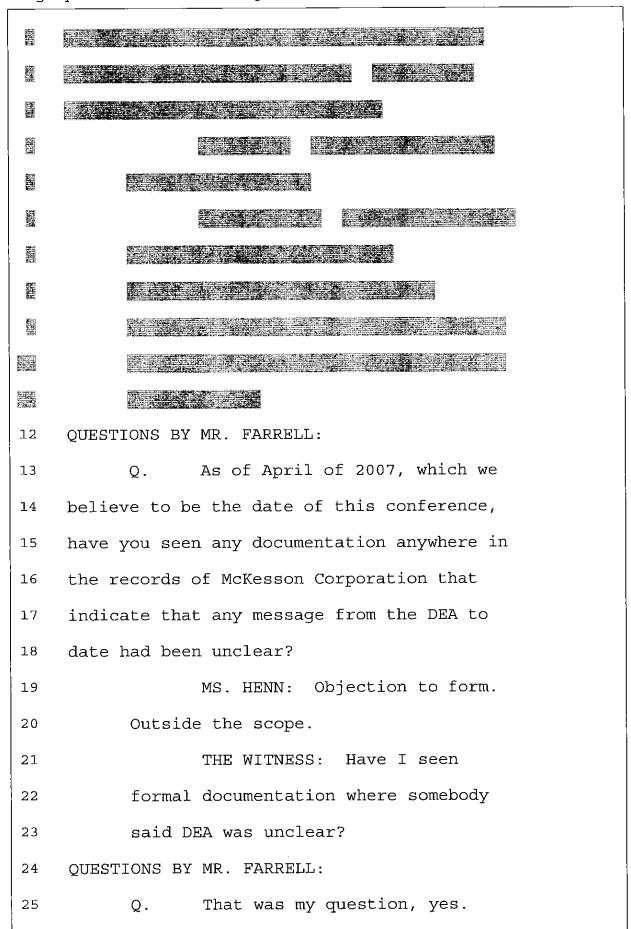
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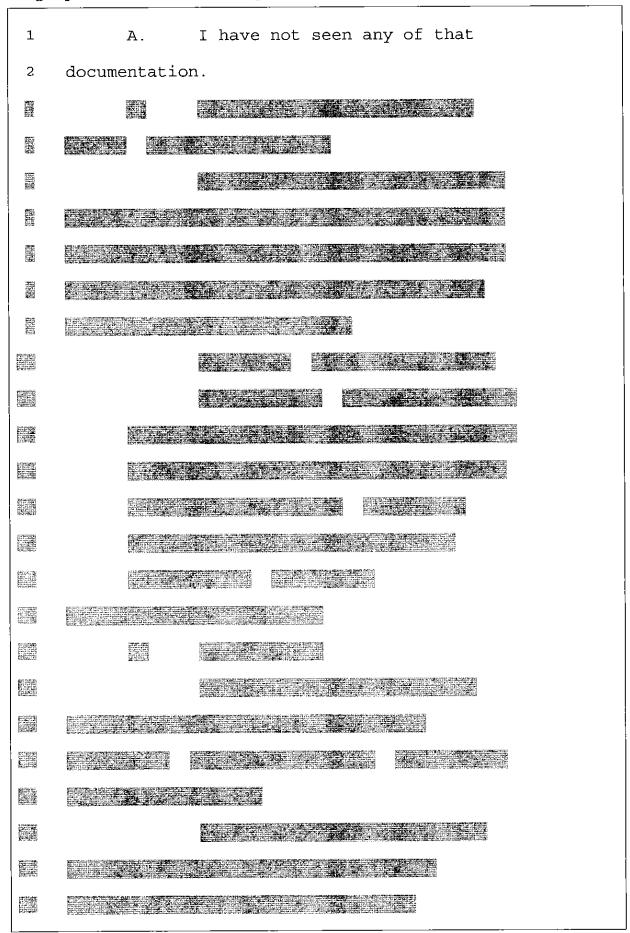
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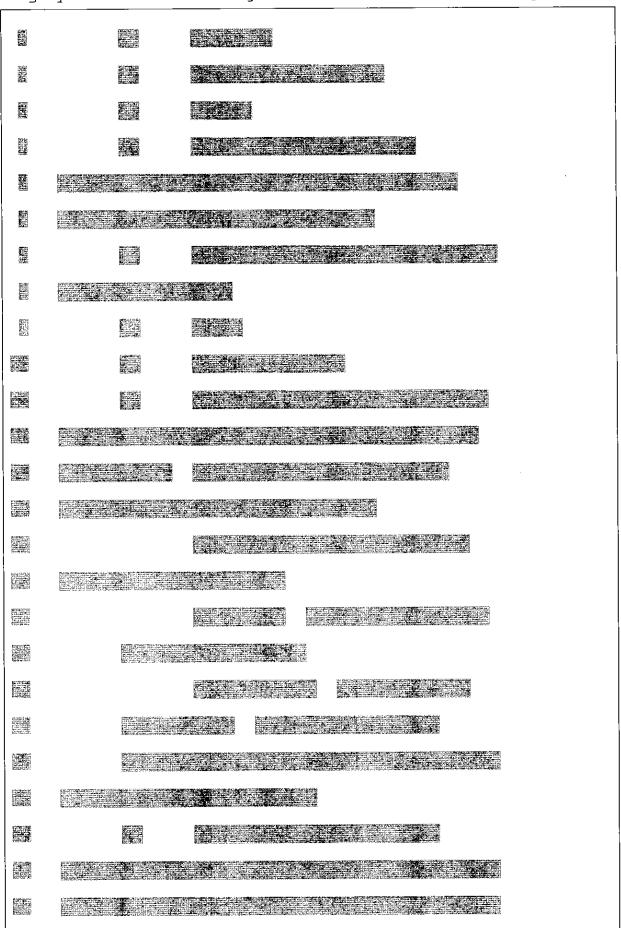
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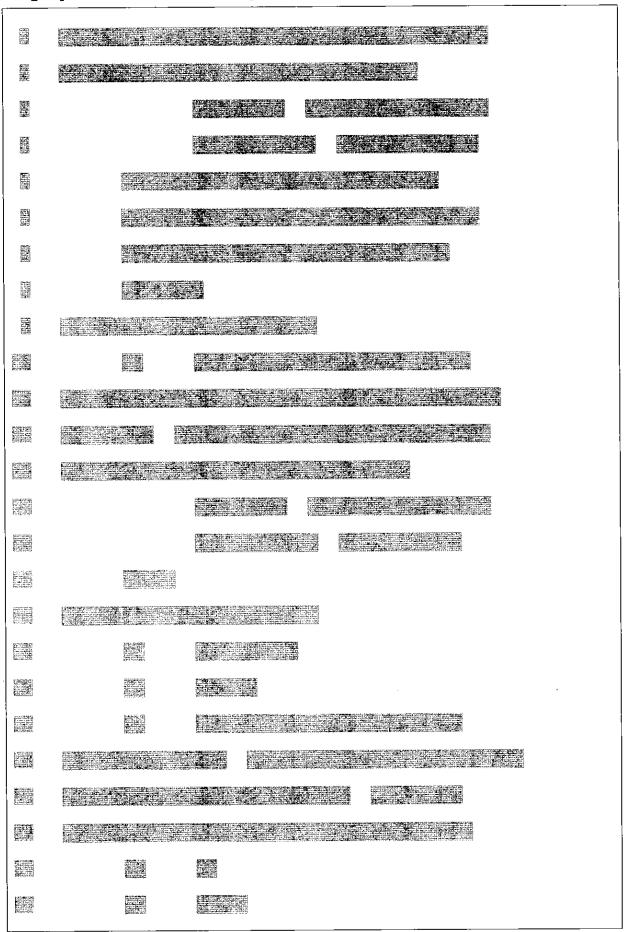
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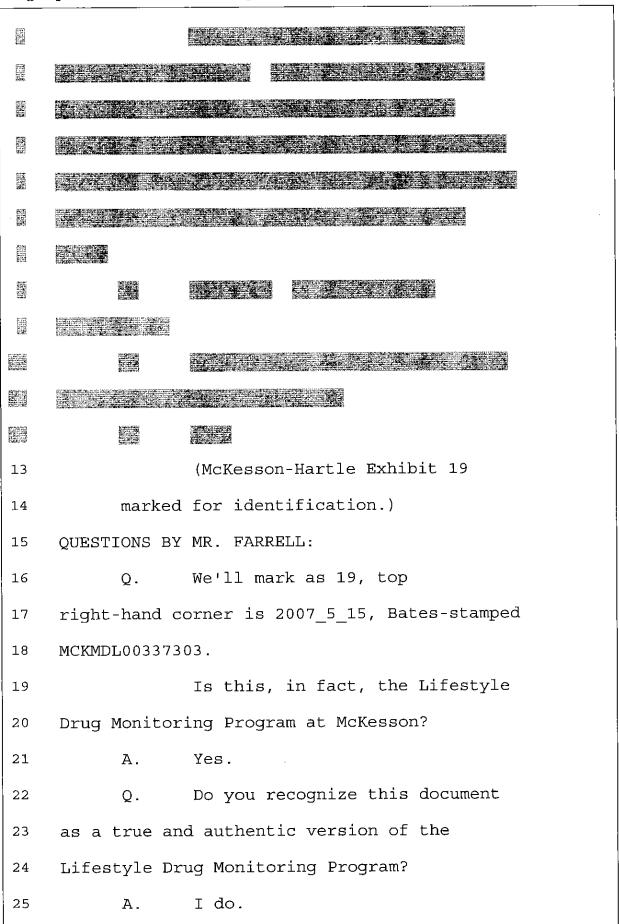
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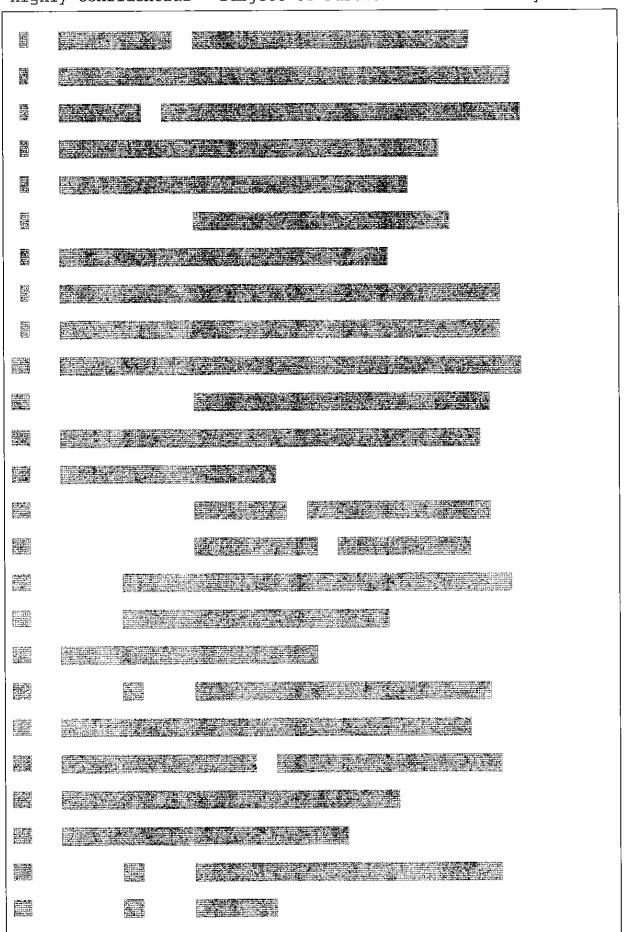


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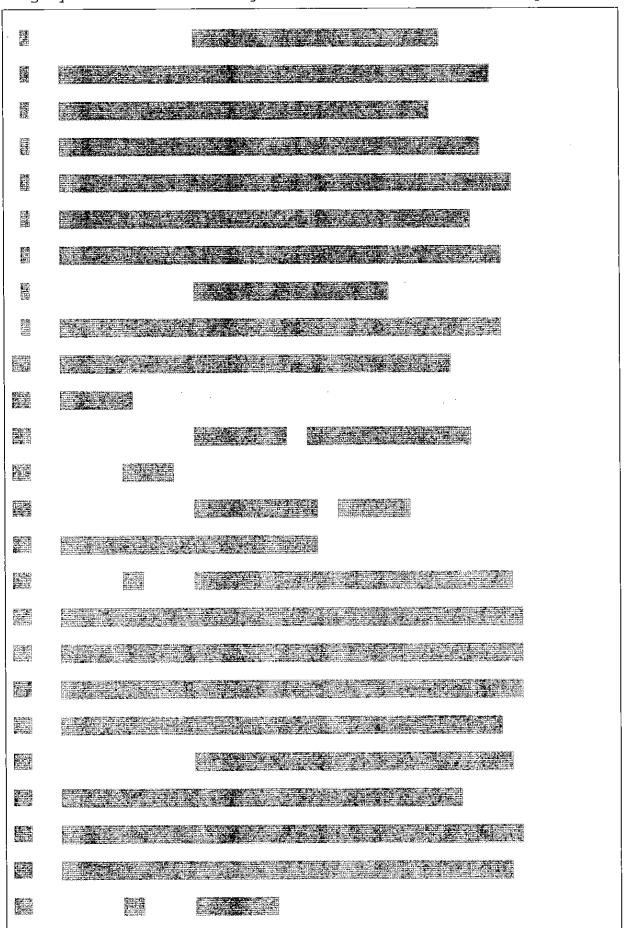


And is it a document kept in 1 the regular course of business and produced 2 by your lawyers in this litigation? 3 MS. HENN: Objection to form. 4 THE WITNESS: Yeah. 5 QUESTIONS BY MR. FARRELL: 6 Series geratic Park S (McKesson-Hartle Exhibit 20 18 marked for identification.) 19 QUESTIONS BY MR. FARRELL: 20 Exhibit 20, top right-hand 21 Q. 22 corner, 2007 06 12, Bates-stamped MCKMDL00355527. 23 I'll represent to you again, 24 this was produced by your counsel in this 25

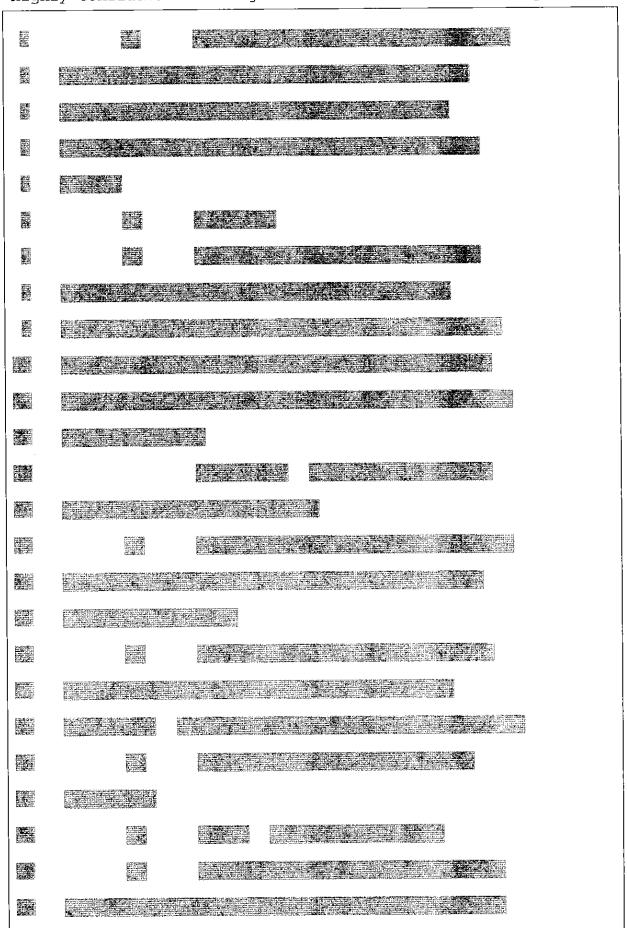
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11.	ighly Confidential - Subject to) F	drener confidenciality keview
	Page 270		Page 272
1	MS. HENN: Objection to form.	1	Do you know what an amicus
2	THE WITNESS: I would say that	2	brief is?
3	there that, you know, the volume	3	A. I do not. I do not have legal
4	of the more pills you have, there	4	background.
5	could be, could be more to diversion.	5	Q. Okay. McKesson Corporation is
6	It doesn't mean that there is. Or I	6	a member of the Healthcare Distributors and
7		7	Manufacturers Association, now known as the
8	would foresee that just an increase in	В	Healthcare Distributors Association, agreed?
9	volume is going to increase diversion.	9	A. Healthcare Distributors
Į	There could be.	10	Management Association?
10	QUESTIONS BY MR. FARRELL:	11	
11	Q. The more pills that are	12	Q. Management, I'm sorry, yes.
12	diverted let me ask you a different way.	13	A. Yes.
13	A. Okay.		Q. Okay. And on May 9, 2012,
14	Q. Does McKesson believe that the	14	Cardinal Health had gotten itself into a
15	more pills that get diverted, the more pills	15	little trouble with the DEA, hadn't it?
16	get abused?	16	MS. HENN: Objection to form.
17	MS. HENN: Objection to form.	17	THE WITNESS: I'm aware of that
18	Outside the scope.	18	time frame and
19	THE WITNESS: Sorry, could you	19	QUESTIONS BY MR. FARRELL:
20	rephrase that one again? Let me	20	Q. They got in trouble with the
21	QUESTIONS BY MR. FARRELL:	21	DEA, very similar to how McKesson got in
22	Q. As McKesson Corporation, do you	22	trouble with the DEA in 2008, agreed?
23	acknowledge that the more pills that get	23	MS. HENN: Objection to form.
24	diverted, the more pills get abused?	24	THE WITNESS: I haven't
25	MS. HENN: Same objections.	25	reviewed this document or all the
	·		
	Page 271		Page 273
	Page 271	,	Page 273
1	THE WITNESS: Again, I'd say	1	details, but in spirit, in general.
2	THE WITNESS: Again, I'd say what I said previously: It could	2	details, but in spirit, in general. QUESTIONS BY MR. FARRELL:
2	THE WITNESS: Again, I'd say what I said previously: It could that could be a possibility. It	2	details, but in spirit, in general. QUESTIONS BY MR. FARRELL: Q. So in on May 9th of 2012,
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2 3 4 5 6	THE WITNESS: Again, I'd say what I said previously: It could that could be a possibility. It depends, but QUESTIONS BY MR. FARRELL: Q. Are people diverting pills to	2 3 4 5 6	details, but in spirit, in general. QUESTIONS BY MR. FARRELL: Q. So in on May 9th of 2012, HDMA, the Healthcare Distribution Management Association, wrote a brief to a federal court here in Washington, DC, in support of
2 3 4 5 6 7	THE WITNESS: Again, I'd say what I said previously: It could that could be a possibility. It depends, but QUESTIONS BY MR. FARRELL: Q. Are people diverting pills to engage in lawful conduct?	2 3 4 5 6 7	details, but in spirit, in general. QUESTIONS BY MR. FARRELL: Q. So in on May 9th of 2012, HDMA, the Healthcare Distribution Management Association, wrote a brief to a federal court here in Washington, DC, in support of Cardinal Health and against the DEA.
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H:	ighly Confidential - Subject to	F	urther Confidentiality Review
_	Page 274		Page 276
1	participating in this amicus brief?	1	couple of questions about it.
2	A. I have not.	2	A. Okay.
3	Q. Are you aware of McKesson being	3	Q. If you flip to page 3
4	involved at all in the amicus briefs?	4	A. Of the brief?
5	MS. HENN: Objection to form.	5	Q. Of the brief.
6	THE WITNESS: I'm not.	6	The very bottom of the page
7	(McKesson-Hartle Exhibit 28	7	MS. HENN: Are you talking
8	marked for identification.)	8	about the Bates numbers or the
9	QUESTIONS BY MR. FARRELL:	9	MR. FARRELL: Yeah, the Bates
10	Q. I'm going to have marked	10	number.
11	Exhibit 28, 2012_05_05.	11	MS. HENN: Thank you.
12	Are you aware of the Wayback	12	QUESTIONS BY MR. FARRELL:
	Machine?	13	Q. It says, "HDMA's members have
14	A. Excuse me?	14	not only statutory and regulatory
15			responsibilities to detect and prevent
	Q. Are you aware of the Wayback Machine?		diversion of controlled prescription drugs,
17	A. I am not.	17	but undertake such efforts as responsible
18		18	members of society."
19	Q. The Wayback Machine is an Internet service that's free, and what it	19	Do you see that?
	•	20	
20	B- 0 1	21	
Į.	websites based on dates and time.		
22	And it just so happens that the	22	acknowledgement that all of the distributors
23	(a) butter in a representation of the repre	23	in the country have a common law duty to the
24		24	people of the United States of America to
25	website, and this is a list of the board of	25	prevent diversion of controlled substances
	Page 275	-	Page 277
1	directors.	1	because you're selling controlled substances?
2	Now, what's an executive	2	MR. SUDDATH: Objection.
3	committee on a board of directors?	3	MS. HENN: Objection to form.
4	MS. HENN: Objection to form.	4	Outside the scope.
5	Outside the scope.	5	THE WITNESS: Okay. Could you
6	THE WITNESS: That's the senior	6	ask me that again?
7	the state of the s	7	
8	QUESTIONS BY MR. FARRELL:	В	Q. Do you recognize this as an
9		9	acknowledgement that all of the distributors
10	0.000	10	in the country have a common law duty to the
11	<u> </u>	11	
12	· · · · · · · · · · · · · · · · · · ·	12	
13		13	illicit market?
14		14	MR. SUDDATH: Objection.
15		15	
16		16	The state of the s
1-3		1	QUESTIONS BY MR. FARRELL:
17		17	
17	Q. You're in the senior leadership	17	`
18	Q. You're in the senior leadership of HDMA, and you signed off on an amicus	18	Q. I mean, isn't this what we
19	Q. You're in the senior leadership of HDMA, and you signed off on an amicus brief submitted to a federal court in	18 19	Q. I mean, isn't this what we talked about earlier?
18 19 20	Q. You're in the senior leadership of HDMA, and you signed off on an amicus brief submitted to a federal court in Washington, DC, in support of one of your	18 19 20	Q. I mean, isn't this what we talked about earlier? A. I do.
18 19 20 21	Q. You're in the senior leadership of HDMA, and you signed off on an amicus brief submitted to a federal court in Washington, DC, in support of one of your colleagues and members, Cardinal Health.	18 19 20 21	Q. I mean, isn't this what we talked about earlier? A. I do. Q. You do, don't you? Yes?
18 19 20 21 22	Q. You're in the senior leadership of HDMA, and you signed off on an amicus brief submitted to a federal court in Washington, DC, in support of one of your colleagues and members, Cardinal Health. MS. HENN: Objection to form.	18 19 20 21 22	Q. I mean, isn't this what we talked about earlier? A. I do. Q. You do, don't you? Yes? A. Yes.
18 19 20 21 22 23	Q. You're in the senior leadership of HDMA, and you signed off on an amicus brief submitted to a federal court in Washington, DC, in support of one of your colleagues and members, Cardinal Health. MS. HENN: Objection to form. Outside the scope.	18 19 20 21 22 23	Q. I mean, isn't this what we talked about earlier? A. I do. Q. You do, don't you? Yes? A. Yes. Q. Because it's not just
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American people to do your very best to prevent diversion. American people to do your very best to prevent diversion. MS. HENN: Objection to form. Quistic the scope. Q. Agreed? A. Agreed. Q. And this is your trade Q. Agreed. MS. HENN: Same objections. Objection to form. Lottiade the scope. MS. HENN: Same objections. THE WITNESS: Yes. A. If flipped to the wrong page. THE WITNESS: Yes. A. If flipped to the wrong page. THE WITNESS: Yes. A. If flipped to the wrong page. THE WITNESS: Yes. MS. HENN: Objection to form. And abuse of controlled prescription drugs and public health authorities." Is that all true? MS. HENN: Objection to form. Outside the scope. THE WITNESS: Yes. THE WITNESS: Ch, excuse me. A If lipped to the wrong page. THE WITNESS: With the diversion of the wrong page. MS. HENN: Objection to form. Outside the scope. THE WITNESS: Ch, and the distributor be held accountable for such societal costs? MS. HENN: Objection to form. Outside the scope. THE WITNESS: Can you repeat that, please? QUESTIONS BY MR. FARRELL: Q. If a wholesale distributor be held accountable for the societal costs of prescription drug abuse? MR. SUDDATH: Objection. Page 279 A. If think it depends. MS. HENN: Objection to form. QUESTIONS BY MR. FARRELL: MS. HENN: Objection. Page 281 MS. HENN: Same objections. THE WITNESS: It depends on the first depends on the facts and circumstances and, you know, the information about the specific situation. We with the DEA's interpretation of its accountable for the societal costs that are documented in this pleading and referenced as publicly and to its own people, agreed? MS. HENN: Object to form. QUESTIONS BY MR. FARRELL: Q. Depends on what? MS. HENN: Objection to form. QUESTIONS BY MR. FARRELL: Q. Depends on what? MS. HENN: Objection to form. QUESTIONS BY MR. FARRELL: Q. Depends on what? MS. HENN: Objection to form. QUESTIONS BY MR. FARRE		ighly Confidential - Subject to	ו נ	didici odilitadilataj na :==::
2 prevent diversion. 3 MS. HENN: Objection to form. 4 Outside the scope. 5 QUESTIONS BY MR. FARRELL: 6 Q. Agreed? 7 A. Agreed. 8 Q. And this is your trade 9 organization making the same representation to a federal court in Washington, DC? 10 MS. HENN: Same objections. 10 Objection to form. Outside the scope. 11 QUESTIONS BY MR. FARRELL: 12 Q. Next sentence: "The public in fall that disprise associated with the diversion and and use of controlled prescription drugs in half accountable for such societal costs? 10 And this is your trade organized over the years by public health authorities." 12 Q. Next sentence: "The public in half that the regulated industry does not know the rules of assist the regulated industry in complying or with the DFA's interpretation of its implementing regulations. HDMA respectfully submits that despite the agency, "meaning DEA, brack that the regulated industry in complying organized industry does not know the rules of those regulated industry does not know the rules of the regulated industry does not know the rules of the regulated industry does not know the rules of the regulated industry object to form. 17 QUESTIONS BY MR. FARRELL: 18 MENEN: Objection to form. 19 QUESTIONS BY MR. FARRELL: 20 The next sentence. This is the part that I'd like to talk to you about, the information about the preventing regulations. HDMA respectfully submits that despite the agency," meaning DEA, bracket the regulated industry does not know the rules of the regulated industry does not know the rules of the regulated industry does not know the rules of the regulated industry does not know the rules of the regulated industry does not know the rules of the regulated industry does not know the rules of the regulated industry does not know the rules of the regulated industry does not know the rules of the regulated industry does not know the rules of the regulated industry does not know the rules of the regulated industry does not know the rules of the regulated industry does not know the rules of the regulat		Page 278		Page 280
2 I also remember saying that 3 Outside the scope. 5 QUESTIONS BY MR. FARRELL: 6 Q. Agreed? 7 A. Agreed. 8 Q. And this is your trade 9 organization making the same representation 10 to a federal court in Washington, DC? 12 MS. HENN: Same objections. 13 Objection to form. Outside the scope. 14 THE WITNESS: Yes. 15 QUESTIONS BY MR. FARRELL: 15 Q. Next sentence: "The public 16 health dangers associated with the diversion and adose of controlled prescription drugs 18 have been well-recognized over the years by 19 Congress, DEA, HDMA and its members, and 19 public health authorities." 19 Is that all true? 20 MS. HENN: Objection to form. 21 Outside the scope. 21 THE WITNESS: Yes. 22 MS. HENN: Objection to form. 23 Outside the scope. 24 THE WITNESS: Yes. 25 WITHE WITNESS: Yes. 26 WITHE WITNESS: Yes. 27 WITHE WITNESS: Yes. 28 WITHE WITNESS: Yes. 29 MR. HENN: Objection to form. 20 Outside the scope. 24 THE WITNESS: Yes. 25 WITHE WITNESS: Yes. 26 WITHE WITNESS: Yes. 27 WITHE WITNESS: Yes. 28 WITHE WITNESS: Yes. 29 WISTIONS BY MR. FARRELL: 20 And if a distributor engages in allowful conduct, should the distributor be beld accountable for such societal costs? 20 WISTIONS BY MR. FARRELL: 21 WITNESS: Yes. 22 WISTIONS BY MR. FARRELL: 23 WITHE WITNESS: Yes. 24 WITHE WITNESS: Yes. 25 WITHE WITNESS: Yes. 26 WITHE WITNESS: Yes. 27 WITHE WITNESS: The leave? 28 WITHE WITNESS: WITHE WITNESS: The leave? 29 WISTIONS BY MR. FARRELL: 20 WITHE WITNESS: The leave? 20 WISTIONS BY MR. FARRELL: 21 WITHESS: WITHE WITNESS: The leave? 22 WISTIONS BY MR. FARRELL: 23 WITHE WITNESS: WITNESS:	1	-	1	THE WITNESS: Oh, excuse me.
MS. HENN: Objection to form.			2	
4 clated to what a suspicious order is is in not clear. 5 QUESTIONS BY MR. FARRELL: 6 Q. Agreed? 7 A. Agreed. 8 Q. And this is your trade organization making the same representation 10 to a federal court in Washington, DC? 11 MS. HENN: Same objections. 12 Objection to form. Outside the scope. 13 THE WITNESS: Yes. 14 QUESTIONS BY MR. FARRELL: 15 Q. Next sentence: "The public health dangers associated with the diversion and abuse of controlled prescription drugs 18 have been well-recognized over the years by public health authorities." 19 MS. HENN: Objection to form. 20 Outside the scope. 21 Is that all true? 22 MS. IIBNN: Objection to form. 23 Outside the scope. 24 THE WITNESS: Yes. 25 Page 279 1 QUESTIONS BY MR. FARRELL: 2 Q. The next sentence. This is the part that I'd like to talk to you about, the implementing regulations. HDMA respectfully submits that despite the agency's of-recited refairly interpretation of its implementing regulations. HDMA respectfully submits that despite the agency's of-recited refairly interpretation are clear, the regulated industry does not know the rules of the road because DEA has not adequately self-the will be publicly and to its own people, agreed? 15 QUESTIONS BY MR. FARRELL: 16 MS. HENN: Object to form. 17 QUESTIONS BY MR. FARRELL: 18 MS. HENN: Object to form. 19 QUESTIONS BY MR. FARRELL: 20 A. I think it depends. 21 THE WITNESS: It depends on the facts and diversion accountable for the societal costs of prescription drug abuse? 22 MS. HENN: Object to form. 23 Graphic them." 24 MS. HENN: Object to form. 25 Outside the scope. 26 MS. HENN: Object to form. 27 Outside the scope. 28 MR. SUDDATH: Objections. 29 Page 279 20 WESTIONS BY MR. FARRELL: 29 A. I think it depends. 20 A. I think it depends. 21 THE WITNESS: It depends on the facts and circumstances and, you know, the information about the specific situation. 29 QUESTIONS BY MR. FARRELL: 30 A. I think it depends of the distributor repeatedly sell-the distributor repeatedly sell-the distributor repeatedly sell-the distr		•	3	
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4 Q. Agreed? 5 A. Agreed. 6 Q. And this is your trade 7 organization making the same representation 8 Q. Fager 1. "The societal costs of 8 prescription drug abuse are" what's it 9 say? 11 MS. HENN: Same objections. 12 Objection to form. Outside the scope. 13 THE WITNESS: Yes. 14 QUESTIONS BY MR. FARRELL: 15 Q. Next sentence: "The public 16 health dangers associated with the diversion 17 and abuse of controlled prescription drugs 18 have been well-recognized over the years by 19 Congress, DEA, HDMA and its members, and 19 public health authorities." 15 Is that all true? 16 MS. HENN: Objection to form. 17 Outside the scope. 18 THE WITNESS: Yes. 19 QUESTIONS BY MR. FARRELL: 20 Q. The next sentence. This is the 4 highlighted part. "The agency," meaning DEA, 5 mas failed to provide meaningful guidance to assist the regulated industry in complying with the DEA's interpretation of its 10 public because DEA has not adequately explained them." 10 QUESTIONS BY MR. FARRELL: 11 Rewith the diversion of its 12 publicly and to its own people, agreed? 13 MS. HENN: Object to form. 14 QUESTIONS BY MR. FARRELL: 15 publicly and to its own people, agreed? 16 MS. HENN: Object to form. 15 QUESTIONS BY MR. FARRELL: 16 Garban on the facts and circumstances and, you know, the information about the specific situation. 16 Garban of the facts and circumstances and, you know, the information about the specific situation. 20 QUESTIONS BY MR. FARRELL: 21 Q. Remember the slide that said 19 clear? Remember your testimony about the letters and the settlement agreement? You 2 said a few minutes ago it was clear. 24 A. I do remember all of that. I 24 MS. HENN: Object to form. 25 A. I do remember all of that. I 26 MS. HENN: Object to form. 26 MS. HENN: Object to form. 27 QUESTIONS BY MR. FARRELL: 28 Q. Remember the slide that said 19 clear? Remember your testimony about the letters and the settlement agreement? You 2 said a few minutes ago it was clear. 24 A. I do remember all of that. I 25 A. I do remember all of that. I 26 A. I do remember all	5	~	5	*
7 Q. Page 7. "The societal costs of prescription drug abuse are" what's it say? 10 to a federal court in Washington, DC? 11 MS. HENN: Same objections. 12 Objection to form. Outside the scope. 13 THE WITNESS: Yes. 14 QUESTIONS BY MR. FARRELL: 15 Q. Next sentence: "The public health adangers associated with the diversion and abuse of controlled prescription drugs have been well-recognized over the years by public health authorities." 12 Is that all true? 13 Outside the scope. 14 THE WITNESS: Yes. 15 WITNESS: Yes. 16 MS. HENN: Objection to form. 17 Outside the scope. 18 THE WITNESS: Yes. 19 QUESTIONS BY MR. FARRELL: 20 Q. The next sentence. This is the part that 7d like to talk to you about, the highlighted part. "The agency," meaning DEA, 5 "has failed to provide meaningful guidance to assist the regulated industry in complying with the DEA's interpretation of its implementing regulations. HDMA respectfully submits that despite the agency's off-recited refrain that the regulations are clear, the regulated industry does not know the rules of the road because DEA has not adequately explained them." 18 McKesson has said the opposite publicly and to its own people, agreed? 19 MS. HENN: Object to form. 10 QUESTIONS BY MR. FARRELL: 21 Q. Remember the slide that said clear? Remember your testimony about the letters and the settlement agreement? You said a few minutes ago it was clear. 22 A. I do remember all of that. I 23 also — 24 MS. HENN: Object to form. 25 QUESTIONS BY MR. FARRELL: 26 Q. Remember the slide that said the letters and the settlement agreement? You said a few minutes ago it was clear. 27 A. I do remember all of that. I 28 also — 29 MS. HENN: Object to form.	6	*	6	
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                                                                                        Page 284
          MS. HENN: Objection to form.
                                                  <sup>1</sup> have the opportunity to look in the camera
1
2
                                                 <sup>2</sup> and tell the jury whether or not you accept
          THE WITNESS: And I believe it
3
      depends.
                                                 <sup>3</sup> partial responsibility for the societal costs
4
   QUESTIONS BY MR. FARRELL:
                                                   of prescription drug abuse in America.
                                                           MS. HENN: Objection to form.
5
      Q.
            On?
                                                       Outside the scope.
6
      Α.
            The facts and circumstances.
                                                    QUESTIONS BY MR. FARRELL:
            How about the facts and
      Ο.
                                                             I'd ask you to answer yes or
   circumstances which led to McKesson paying
                                                       Q.
   $150 million fine?
                                                 9
                                                   no.
                                                 10
10
                                                           MS. HENN: Same objections.
          MS. HENN: Objection to form.
11
          THE WITNESS: Again, I think it
                                                 11
                                                            THE WITNESS: I'm not sure how
                                                 12
12
                                                       to answer that -- that question
      depends.
                                                 13
13
   QUESTIONS BY MR. FARRELL:
                                                       specifically.
14
                                                 14
                                                   QUESTIONS BY MR. FARRELL:
       Q.
          Do you think McKesson is partly
15
                                                 15
   responsible for the societal costs of
                                                        Q.
                                                             Well, you can say yes or --
                                                 16
16
                                                             I understand that.
   prescription drug abuse in America?
                                                17
                                                             -- you can say no.
17
           MS. HENN: Objection to form.
                                                        Q.
18
                                                 18
                                                            I understand that.
          THE WITNESS: Could you ask
                                                 19
                                                            MS. HENN: Objection to form.
19
       that one again, please?
20
   QUESTIONS BY MR. FARRELL:
                                                 20
                                                    QUESTIONS BY MR. FARRELL:
                                                 21
21
            Do you think McKesson is partly
                                                             If I asked you the same
<sup>22</sup> responsible for the societal costs of
                                                   question in your personal capacity, would
   prescription drug abuse in America?
                                                   that help you answer the question better?
24
                                                 24
                                                            MS. HENN: Same objection.
           MS. HENN: Objection to form.
                                                 25
25
                                                        Objection to form.
           THE WITNESS: Again, there's a
                                       Page 283
                                                                                        Page 285
1
                                                  1
                                                            THE WITNESS: Again, it
       lot of people involved in -- it's a
                                                 2
2
       very complicated and multi-faceted
                                                        depends -- I would say it doesn't
                                                  3
3
                                                        change my answer. It depends on the
       issue, so...
                                                        role that they played.
   QUESTIONS BY MR. FARRELL:
                                                    QUESTIONS BY MR. FARRELL:
       Q.
            We'll get to the other people
                                                             Well, back to McKesson
   in a second.
7
                                                   Corporation, which is you sitting in the
           MS. HENN: Are you done with
8
      your answer?
                                                   chair today. Knowing what you know as the
           THE WITNESS: I am done.
                                                    30(b)(6) representative, the corporate
10
           MS. HENN: Okay.
                                                 10 designee, knowing about your past conduct,
                                                 11 knowing about the past interactions with the
   QUESTIONS BY MR. FARRELL:
12
            We'll get to the others in a
                                                 12 DEA, I'm going to ask you again: Does
13
   second. I want to talk about McKesson first.
                                                 <sup>13</sup> McKesson Corporation accept partial
14
           This is your opportunity to
                                                   responsibility for the societal costs of
                                                 15
15 accept partial responsibility for the
                                                    prescription drug abuse in America?
                                                 16
                                                            MS. HENN: Objection to form.
   societal costs of prescription drug abuse in
                                                 17
17
                                                            THE WITNESS: Again, you know,
   America; yes or no?
                                                 18
                                                        I -- we're part of the closed system,
18
           MS. HENN: Objection to form.
19
                                                 19
       Also outside the scope.
                                                        so we're responsible for preventing
                                                 20
20
           THE WITNESS: So again, it
                                                        diversion.
21
                                                 <sup>21</sup> OUESTIONS BY MR. FARRELL:
       depends on -- it depends.
                                                 22
22
   QUESTIONS BY MR. FARRELL:
                                                             So the answer is?
23
            You're McKesson Corporation.
                                                 23
                                                            MS. HENN: Objection to form.
       Q.
                                                 24
24
                                                            THE WITNESS: Again, I think
       A.
            Right.
                                                 25
                                                        we're responsible for something. I
       Q.
            You're sitting here today. You
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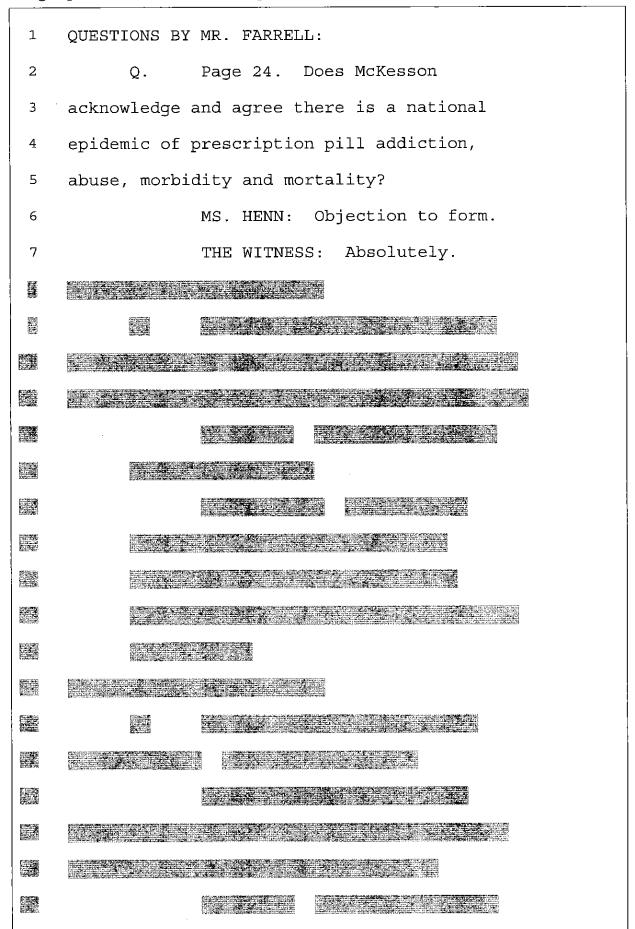
	ighly Confidential - Subject to		<u> </u>
	Page 286		Page 288
1	don't know what how you define all	1	A. I have not.
2	societal costs and I still believe	2	Q. Do you know who Gary Boggs is?
3	it depends on different circumstances.	3	A. I do know Gary.
4	QUESTIONS BY MR. FARRELL:	4	Q. I'll represent to you that on
5	Q. Sir, we're not going to parse	5	the metadata that was provided by the
6	out percentages.	6	McKesson, indicates that this presentation is
7	A. Yeah.	7	dated in late 2012 wait, late 2013, I
8	Q. Let's just talk globally for	8	think, probably before Gary Boggs came on to
9	McKesson Corporation. So I don't want to put	9	McKesson. We'll ask him when we depose him.
	words in your mouth because it's got to come	10	But anyway, this is a McKesson
	out of your mouth. So the answer is yes or	11	spreadsheet from Gary Boggs. Gary Boggs is
	no.	12	former DEA.
13	MS. HENN: Objection to form.	13	A. PowerPoint, not spreadsheet.
14	THE WITNESS: I would say yes,	14	Q. Yeah, I'm sorry.
15	partially.	15	A. Okay.
16	QUESTIONS BY MR. FARRELL:	16	Q. He's former DEA, correct?
17	Q. How about Purdue Pharma? Does	17	A. Correct.
18	McKesson Corporation take the position that	18	Q. He was the number 2 man on Joe
	Purdue Pharma is partially responsible for	19	Rannazzisi, yes?
20	the societal costs of prescription drug abuse	20	A. Yes.
21	in America?	21	Q. And as we'll see later, he was
22	MS. HENN: Objection to form.	22	actually in the room for one of the
23	Outside the scope.	23	presentations when DEA was negotiating with
24	THE WITNESS: I'm not going to	24	McKesson on the 2008 settlement.
25	answer for other companies. I'm	25	Is that your memory as a
-	Page 287	-	T. 000
1	rage 207		Page 289
1	-	1	-
1 2	it's like I answered my question:	1 2	corporate entity?
	it's like I answered my question: Those involved in this space,	1	corporate entity? MS. HENN: Objection to form.
2	it's like I answered my question: Those involved in this space, depending on the facts and	2	corporate entity? MS. HENN: Objection to form. THE WITNESS: I wasn't aware
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	Page 290	_	Page 292
1	MS. HENN: Objection to form.	1	played a role.
2	THE WITNESS: I see that.	2	QUESTIONS BY MR. FARRELL:
3	QUESTIONS BY MR. FARRELL:	3	Q. Does McKesson believe the
4	Q. "In the late 1990s, doctors	4	manufacturers fueled the use of prescription
5	aggressively prescribing painkillers - a	5	painkillers?
	radical change in health care behavior."	6	MS. HENN: Objection to form.
7	And that radical change in	7	Outside the scope.
8	health care behavior did what to the number	8	THE WITNESS: I think they
9	of prescriptions?	9	played a role. I think there's many
10	MS. HENN: Objection to form.	10	reasons many things that fueled the
11	THE WITNESS: Increased them.	11	epidemic.
12	QUESTIONS BY MR. FARRELL:	12	QUESTIONS BY MR. FARRELL:
13	Q. Which resulted in an increase	13	Q. So would you rather just punt
14	or decrease in the number of pills McKesson	14	on the question?
15	sold?	15	MS. HENN: Objection to form.
16	A. I don't know exact numbers, but	16	THE WITNESS: That's what I'm
17	it increased.	17	going to share. That's my answer.
18	Q. And then the last part,	18	QUESTIONS BY MR. FARRELL:
	"Manufacturers fueled the use of prescription	19	Q. So yes or no, does McKesson
1	painkillers."	20	Corporation believe manufacturers fueled the
21	This is coming from your new	21	use of prescription painkillers?
	head of regulatory affairs at McKesson,	22	MS. HENN: Objection to form.
23	agreed?	23	Outside the scope.
24	MS. HENN: Objection to form.	24	THE WITNESS: Like I said,
25	THE WITNESS: Can you say that	25	my they're part of the system.
	· · · · · · · · · · · · · · · · · · ·		
	Page 291		Page 293
1	again?	1	They played a role.
2	again? QUESTIONS BY MR. FARRELL:	2	They played a role. QUESTIONS BY MR. FARRELL:
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They appear to be 1 THE WITNESS: related. 2 OUESTIONS BY MR. FARRELL: 3 Does McKesson believe that Ο. opioid sales are related to opioid deaths? 5 MS. HENN: Objection to form. 6 7 Outside the scope. THE WITNESS: Can you ask that 8 9 one more time, please? 10 QUESTIONS BY MR. FARRELL: 11 Does McKesson believe that Q. opioid sales are related to opioid deaths? 1.2 13 MS. HENN: Objection to form. Outside the scope. 14 THE WITNESS: The volume of 15 16 opioids in the market and diversion is related to opioid deaths, certainly. 17 18 QUESTIONS BY MR. FARRELL: 19 Page 8, the Controlled Q. Substances Act, the very last provision says, 20 "Creates checks and balances between 21 registrants to protect the public health and 22 safety." 23 24 Again, this is again a 25 reaffirmation from Gary Boggs, who is now one

- of your senior regulatory affairs management,
- 2 acknowledging that the registrants and the
- 3 DEA have a duty to protect the public health
- 4 and safety, agreed?
- 5 A. Agreed.
- 6 Q. Page 13. It says, "What can
- 7 happen when these checks and balances
- 8 collapse?"
- 9 What do you believe this is a
- 10 picture of?
- MS. HENN: Objection to form.
- 12 THE WITNESS: It's a building
- falling down.
- 14 QUESTIONS BY MR. FARRELL:
- 15 Q. A disaster?
- 16 A. It's a building that's falling
- 17 down. Why it fell down could be a disaster.
- 18 Q. What do you infer from
- 19 Mr. Boggs' implication?
- 20 A. That things can go wrong,
- 21 something can happen.
- 22 Q. Page 16, pictures of pain
- 23 clinics and people waiting in line to
- 24 purchase pills sold by McKesson to
- 25 pharmacies.

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MS. HENN: Objection to form.
1
              MR. FARRELL: You're right.
2
        That's not necessarily a picture of
3
        McKesson.
4
   QUESTIONS BY MR. FARRELL:
5
醫
        OUESTIONS BY MR. FARRELL:
12
              Page 17, historical comparison.
13
        Ο.
   He's comparing the opioid crisis to the BP
14
   oil spill where 11 people were killed and BP
15
   paid 40 billion, plus 16 billion to the Clean
16
17
    Water Act.
              Have more or less than 11
18
    people been killed by the opioid crisis?
19
20
         Α.
              Clearly more.
              Have more people died today
21
         Q.
    than 11 people?
22
              MS. HENN: Objection to form.
23
              THE WITNESS: Based on the
24
         statistics, yes.
25
```



Page 318 Page 320 1 Obviously, it's going to be So we have about an hour left; 2 2 we've been going about -- almost six subject to the objection of your 3 3 hours. So by agreement we've kept the lawyers, and I just wanted to place that on the record. 4 deposition days to seven hours long, 5 and I'll honor that. ⁵ QUESTIONS BY MR. FARRELL: 6 MS. HENN: More than by Q. Jumping in real quick, I'm not 7 agreement. It's also ordered by the going to spend a whole lot of time on this; I 8 judge. have a very specific question. 9 Before we get into the MR. FARRELL: No question. 10 MS. HENN: Just a slight document, there's a reference in here about 11 11 heroin, and I just wanted to see if I could clarification. 12 MR. FARRELL: No question. cut to the chase with you. 13 Seven hours of answering questions is 13 A. Okay. 14 14 enough for anybody. O. As the McKesson corporate 15 15 representative, do you acknowledge that abuse MS. HENN: It is. MR. FARRELL: That being said, of prescription opium pills is a gateway to 16 17 the initiation of heroin? I know there's a burden on travel and 18 18 MS. HENN: Objection to form. arrangements; we have a tight 19 schedule. So what I'm going to do is 19 Outside the scope. THE WITNESS: Based on 20 I'm going to finish up some topics, 20 21 and I'm going to state for the record 21 everything that I've read and in the 22 22 that I have not been able to get media and statistics and discussion, I 23 through all of the designated topics 23 would agree -- agree to that. 24 today. ²⁴ QUESTIONS BY MR. FARRELL: 25 25 That being said, there are some If you abuse prescription Page 319 Page 321 1 additional topics that you were not ¹ opiates, the CDC says that you're 40 times 2 designated for. There's essentially more likely to initiate heroin use. 3 two notices. Does McKesson acknowledge 4 So what we're -- what I'm going 4 that -- that prescription opiate pill abuse ⁵ is a driving factor in the heroin epidemic 5 to do is recommend that I finish up 6 the topics that I want to get to, and we're also experiencing? 7 MS. HENN: Objection to form. then tomorrow is your fact deposition. В And what we'll do is work out with Θ Outside the scope. 9 9 counsel if there are any of these THE WITNESS: Yeah, it's a 10 10 questions that can be answered in factor. 11 11 writing to avoid you having to come **QUESTIONS BY MR. FARRELL:** 12 back and testify on things that can be 12 Q. That was easy. 13 13 answered. A. Yeah. 14 14 And then in addition, there are Q. All right. Back to this amicus 15 15 records and there are -- there is business. 16 transactional data historically and 16 (McKesson-Hartle Exhibit 38 17 17 suspicious order report historically marked for identification.) 18 that have not been disclosed yet 18 QUESTIONS BY MR. FARRELL: 19 19 because of our tight schedules that I'm going to mark as ²⁰ Exhibit 38, it's 2016_04_04. This is another 20 I'll -- I will be going to ask --21 eventually to ask for some additional amicus brief. This one is Masters 22 22 time from you to finish the stuff we Pharmaceutical. 23 didn't get to finish and to ask Does McKesson acknowledge that 24 questions about documents that have ²⁴ in 2016 when this amicus brief was submitted 25 not been disclosed yet. 25 that it was still on the executive committee

OUESTIONS BY MR. FARRELL: 1 Do you agree that filling 2 0. suspicious orders is a direct and proximate 3 cause of prescription opioid abuse, addiction, morbidity and mortality? 5 MS. HENN: Objection to form. 6 THE WITNESS: Filling specific 7 orders? 9 MS. HENN: Suspicious orders is the word he used. 10 THE WITNESS: Suspicious 11 12 orders. There's a lot of reasons for --13 14 that orders may get flagged as suspicious, so I think it depends. 15 QUESTIONS BY MR. FARRELL: 16 That's fair. 17 Q. They'll get flagged as an order 18 of unusual size, frequency or pattern and not 19 mean that it's suspicious or 20 diversion-related. 21 22 Do you believe the prescription Q. opiate epidemic is an immediate hazard to 23 24 public health and safety? MS. HENN: Objection to form. 25

пт	gnly Confidential - Subject to	, ,	dicher confidenciality have
	Page 366		Page 368
1	THE WITNESS: How do you how	1 2	CERTIFICATE
2	are you defining "immediate hazard"?	3	I CARRIE A CAMPRELL Registered
3 (QUESTIONS BY MR. FARRELL:		I, CARRIE A. CAMPBELL, Registered Diplomate Reporter, Certified Realtime Reporter and Certified Shorthand Reporter, do
4		4	Reporter and Certified Shorthand Reporter, do
	•	5	of the examination. Nathan I. Hartle was duly
5	A. A hazard?	_	sworn by me to testify to the truth, the
6	Sure.	6	hereby certify that prior to the commencement of the examination, Nathan J. Hartle was duly sworn by me to testify to the truth, the whole truth and nothing but the truth. I DO FURTHER CERTIFY that the
7	MR. FARRELL: Okay. We will	'	foregoing is a verbatim transcript of the
8	adjourn with the reservation of rights	В	foregoing is a verbatim transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth, to the best of my
9	for one day, continuing the subject	9	before me at the time, place and on the date
10	matters that most interest the	1	ability.
		10	•
11	plaintiffs in the MDL in the 30(b)(6)	11	neither a relative nor employee nor attorney
12	notices.	l	nor counsel of any of the parties to this
13	MS. HENN: And, I mean, we will	12	I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the
14	object to continuing past the limit	13	that I am not financially interested in the
15	set by the Court. We feel that there	14	action.
16	was a lot of time today that was spent	15	
17	asking legal questions that could have		CARREL CAL CREAT
	*	17	CARRIE A, CAMPBELL,
10	been spent on topics.	18	Certified Realtime Reporter
19	MR. FARRELL: There was also a	19	California Certified Shorthand
20	lot of time spent reading documents	- 3	Missouri Certified Court Reporter #859
21	that were listed in my 30(b)(6).	20	CARRIE A, CAMPBELL, NCRA Registered Diplomate Reporter Certified Realtime Reporter California Certified Shorthand Reporter #13921 Missouri Certified Court Reporter #859 Illinois Certified Shorthand Reporter #084-004229 Texas Certified Shorthand Reporter #9328
22	MS. HENN: Documents that you	21	#084-004229 Tayes Cartified Shorthand Reporter #0328
23	put in front of the witness and wanted		Texas Certified Shorthand Reporter #9328 Kansas Certified Court Reporter #1715 Notary Public Dated: August 3, 2018
24	him to read.	22 23	Notary Public
25		24	Dated: August 3, 2018
25	But more importantly, I wanted	25	
· · · · ·	Page 367		Page 369
1	to ask the court reporter to please	1	INSTRUCTIONS TO WITNESS
2	designate this transcript	2	
3	•	3	Diago rand your danceition over
	provisionally highly confidential,		Please read your deposition over
4	which is required under the deposition	4	carefully and make any necessary corrections.
5	protocol, and I also wanted to reserve	5	I ou should state the leason in the
6	the right to read and sign.	6	appropriate space on the errata sheet for any
7	I have no questions, and so I	7	corrections that are made.
В	think we are finished.	В	After doing so, please sign the
9	VIDEOGRAPHER: Okay. The time	9	
10	is 5:47 p.m., July 31, 2018. Going	10	
i			
11	off the record completing today's	11	me enate breed, which was de assessed to
12	videotaped session.	12	your deposition.
13	(McKesson-Hartle Exhibit 40	13	it is important of that you retain
14	marked for identification.)	14	the original errata sheet to the deposing
	· · · · · · · · · · · · · · · · · · ·	15	
15	(Deposition concluded at 5:47 p.m.)		
15 16	(Deposition concluded at 5:47 p.m.)	16	of the deposition transcript by you. If you
16	(Deposition concluded at 5:47 p.m.)	16 17	of our approximation by Jam 11 Jam
16 17	(Deposition concluded at 5:47 p.m.)	17	fail to do so, the deposition transcript may
16 17 18	(Deposition concluded at 5:47 p.m.)	17 18	fail to do so, the deposition transcript may be deemed to be accurate and may be used in
16 17 18 19	(Deposition concluded at 5:47 p.m.)	17 18 19	fail to do so, the deposition transcript may be deemed to be accurate and may be used in court.
16 17 18 19 20	(Deposition concluded at 5:47 p.m.)	17 18 19 20	fail to do so, the deposition transcript may be deemed to be accurate and may be used in court.
16 17 18 19 20 21	(Deposition concluded at 5:47 p.m.)	17 18 19 20 21	fail to do so, the deposition transcript may be deemed to be accurate and may be used in court.
16 17 18 19 20 21	(Deposition concluded at 5:47 p.m.)	17 18 19 20 21 22	fail to do so, the deposition transcript may be deemed to be accurate and may be used in court.
16 17 18 19 20 21	(Deposition concluded at 5:47 p.m.)	17 18 19 20 21 22 23	fail to do so, the deposition transcript may be deemed to be accurate and may be used in court.
16 17 18 19 20 21	(Deposition concluded at 5:47 p.m.)	17 18 19 20 21 22	fail to do so, the deposition transcript may be deemed to be accurate and may be used in court.